

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re Petition of)

MERIDIAN COMMUNICATIONS COMPANY)

For Amendment of § 73.606(b),
TV Table of Allotments,
to Delete Channel 34 from
Lake Havasu City, Arizona and to
Add Channel 34 at Laughlin, Nevada)

RM-_____

MM Docket No. _____

To: The Chief, Allocations Branch

RECEIVED
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OFFICE OF SECRETARY

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PETITION FOR RULEMAKING

Meridian Communications Company ("Meridian"), permittee of an unbuilt television station authorized to operate on Channel 34 at Lake Havasu City, Arizona, by its attorneys and pursuant to Sections 1.401 and 1.420(i) of the Commission's Rules, hereby petitions for rulemaking to amend the Television Table of Allotments (Section 73.606(b) of the Commission's Rules) to change the community of license of Channel 34 from Lake Havasu City, Arizona to Laughlin, Nevada, thus providing Laughlin with its first television transmission outlet. Meridian further requests that the Commission modify the station's construction permit to specify Laughlin, Nevada as its city of license.

This petition is submitted pursuant to the Commission's Report and Order in MM Docket No. 88-526 (Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License), 4 FCC Rcd. 4870 (1989) ("1989 Report and Order"), recon. granted in part, Memorandum Opinion and Order in MM Docket No. 88-526, 5 FCC Rcd. 7094 (1990) ("1990 MO&O"). In that proceeding, the Commission amended Section 1.420 of the

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Commission's rules to provide a procedure whereby a licensee or permit holder may seek an amendment of the FM or Television Table of Allotments to specify a different community of license without placing its existing authorization at risk. In its rulemaking decisions adopting the simplified procedure, the Commission indicated that such a change in the community of license of a TV or FM station will be approved if (i) the new allotment is mutually exclusive with the existing allotment and (ii) the allotment to the new community "would result in a net service benefit for the communities involved (that is, if the plan would result in a preferential arrangement of allotments)." See 1989 Report and Order, 4 FCC Rcd. at 4873.

In the present case, Meridian submits that the proposed amendment to the Television Table of Allotments meets the Commission's criteria. The proposed change in the community of license of Channel 34 to Laughlin is mutually exclusive with the existing allotment to Lake Havasu. See Engineering Statement of Michael W. Radovich, P.E., attached hereto as Exhibit A. Further, while Meridian recognizes that the Commission also has indicated that the removal of a community's only existing television service is disfavored, see 1990 MO&O, 5 FCC Rcd. at 7096,¹ the presumption against removal of a sole television transmission service may be waived where to do so "might serve the public interest by, for example, providing a first reception service to a significantly sized population." Id.

¹ Channel 34 is the only TV channel now allotted to Lake Havasu City. The community also is served, however, by commercial radio stations KFWJ(AM), KBBC(FM), KJCC(FM), and KZUL-FM, and by noncommercial educational FM station KNLB. Broadcasting and Cable Yearbook 1996, p. B-20. Laughlin, Nevada has no existing TV service or allotment. Laughlin is the city of license of KLSQ(AM), KLUK(FM), and KADD(FM), which apparently is not yet on the air. Id. at B-262.

The Commission subsequently has made clear, moreover, that for purposes of this rule, an "existing service" is a station which has been constructed and is currently operating. Farmington and Gallup, New Mexico, 11 FCC Rcd. 2357, 2360 (Chief, Allocations Branch, 1996). Thus, the removal of an unconstructed station, such as Meridian's proposed facility on Channel 34, is "mitigated by the fact that [the station is] not a service upon which the public has come to rely" Id.² Further, the attached Engineering Statement demonstrates that Channel 40 or any of eleven other UHF television channels could be allotted to Lake Havasu City to replace Channel 34, should there be an expression of interest in preserving a local television transmission outlet for that community. See Engineering Statement at 1, 4.

The allotment of Channel 34 to Laughlin would further the Commission's television priorities by providing that community with its first local television transmission facility and permitting Meridian's new television station to serve a far larger area and population than would be possible with a facility licensed to Lake Havasu City. Meridian's currently authorized facilities specify a transmitter location at the Crossman Peak Communications site, approximately 13.8 kilometers east-northeast of Lake Havasu City, Arizona. See FCC File No. BPCT-941031KN. As set forth in the attached Declaration of Gerald R. Proctor, there is no commercial electric power

² Meridian's application for a construction permit for the new station on Channel 34 (File No. BPCT-941031KN) was granted on May 1, 1996, when the Commission approved Meridian's settlement agreement with Venture Technologies Group, Inc. d/b/a World Television, Inc., resolving the conflict between their mutually exclusive applications. See Letter to Meridian Communications Company from Barbara A. Kreisman, Chief, Video Services Division, dated May 1, 1996. Thus, Meridian did not obtain its permit in a comparative hearing. See 1990 MO&O, 5 FCC Rcd. at 7097.

supply to the Crossman site. Rather, electricity is generated on-site by the principal occupant, Fisher Communications. The available excess power, over and above Fisher's needs, is sufficient only to power a 10 kilowatt television transmitter. Accordingly, Meridian's application for a construction permit for the Lake Havasu City station specified that power level. From the Crossman site, the new station on Channel 34 would provide Grade B service to approximately 51,274 persons in an area of 10,193 square kilometers. See Engineering Statement at 3.

As Mr. Proctor explains, the optimum site for maximized coverage of the portion of Arizona, California, and Nevada surrounding Lake Havasu City is a Bureau of Land Management site at Oatman, Arizona.³ This site, which is designated as the Goldroad Crest Communications Site by the Bureau, is currently under final review prior to adoption of a comprehensive plan of development. As shown in the attached Engineering Statement, a Channel 34 facility operating from the Goldroad Crest site would meet all Commission spacing requirements, and would provide a Grade B signal to approximately 106,572 people in an area of 33,979 square kilometers. Thus, operation from the Goldroad Crest site would triple the area and more than double the population receiving Grade B service from the new facility. See Engineering Statement at 3. In addition, the proposed facility operating from the Goldroad Crest site would provide a second visual service to 62,088 persons in an area of 21,182 square kilometers -- an increase of 12,815 persons and 11,610 square kilometers from the currently authorized Meridian's site. Id.

³ Mr. Proctor has not been able to identify any other developed sites which will allow for increased coverage of the area. Declaration of Gerald R. Proctor at ¶¶ 3-4.

Unfortunately, due to shadowing problems, it is doubtful that a new facility on Channel 34 would be able to provide city grade service to all of Lake Havasu City from the Goldroad Crest site. See Declaration of Gerald R. Proctor at ¶ 3. The new facility would, however, provide city grade coverage to the entirety of Laughlin, Nevada. See Engineering Statement at 2.

Thus, in order to maximize the service potential of the new station on Channel 34, Meridian requests that the Commission change the station's community of license to Laughlin, Nevada. Meridian is confident that the stations' improved transmitter location and significantly enhanced coverage capabilities will greatly strengthen its ability to develop the audience and advertising support necessary to a new station's economic viability, and will also increase the chances of securing a network affiliation in the future. By improving its prospects for economic success, the proposed reallocation also will augment Meridian's ability to serve the programming needs of the area the station will serve.

Meridian submits that the proposed change in community of license is further justified because, as detailed below, Laughlin, Nevada is a high growth area with a concomitant need for a local television transmission service. In contrast, Lake Havasu is a more mature community which appears to have reached a population peak and is currently experiencing a period of slower growth or even decline in population.

Laughlin, which is listed as a Census Designated Place ("CDP") in the 1990 U.S. Census,⁴ is governed by a town advisory board and a town manager. Laughlin Transit, Inc. operates three 7-day-per-week bus routes that serve the business and residential areas of Laughlin and Bullhead City, Arizona.⁵ Transit between the two cities has been facilitated by the recent completion of a bridge connecting the two cities, which is used by 40,000 residents and visitors daily.⁶ The \$23 million Laughlin/Bullhead City Airport opened in 1992, serving both communities. The airport has a 7,500 foot runway that accommodates Boeing 737s. More than 20,000 passengers and 400 flights per week are logged at the facility.⁷ Laughlin has its own library and medical center as well as an elementary school serving grades Kindergarten through 5. Laughlin High School, opened in 1991, serves grades 6 through 12. Laughlin also is the site of Community College of Southern Nevada-Laughlin campus.⁸

Although the Laughlin Chamber of Commerce estimates the current population of Laughlin between 8,000 and 9,000, there are approximately 42,000 permanent

⁴ See U.S. Dept. of Commerce, Economics and Statistics Admin., Bureau of the Census, 1990 Census of Population and Housing, Nevada, p. 8 (1990). Accordingly, Laughlin clearly qualifies as a "community" for purposes of Section 307(b) of the Communications Act. See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 101 (1982). Neither Laughlin, Nevada nor Lake Havasu City, Arizona is part of any "Urbanized Area."

⁵ History of Laughlin (from Internet Las Vegas On-Line Entertainment Guide, Charleston Communications) at 8. Laughlin and Bullhead City are twin cities separated by the Colorado river.

⁶ Id. at 6.

⁷ Id. at 6-7.

⁸ Id. at 7-8.

residents in the area near Laughlin that would be served by the proposed station.⁹ The number of visitors to Laughlin has doubled from 2.5 million in 1989 to 5-6 million in 1995. Most importantly, however, the increase in the level of building permits issued over the last five years in Laughlin makes clear that Laughlin is a high growth area. In 1991, the Laughlin Building Department issued building permits for 11,391 units; in 1992, 14,036 units; in 1993, 7,977 units; in 1994, 12,568 units; in 1995, 17,889 units. Through May of 1996, the Laughlin Building Department already has issued building permits for an additional 13,321 units.¹⁰

Although Lake Havasu City has a higher current population than Laughlin,¹¹ it is not experiencing the same type of growth. Data collected by Arizona Business, published by Arizona State University and made available by the local Chamber of Commerce, shows that the number of new building permits issued in Lake Havasu City decreased from 1,842 in 1990, to 1,462 in 1993, to 1,384 in 1994. The data thus suggests that this area of Arizona may be entering a period of decreased popularity and minimal growth.¹²

⁹ Id. at 9. This includes Bullhead City and the unincorporated area that stretches from Laughlin to the California state line.

¹⁰ These numbers were provided by the Laughlin Building Department.

¹¹ The Lake Havasu City Chamber of Commerce estimated its 1996 population at 41,000. The United States Census Bureau and the Arizona Department of Economic Security found the population of Lake Havasu City to be 24,363 in 1990. See Arizona Department of Commerce, "Community Profile, Lake Havasu City."

¹² See Charles F. Longino, "From Sunbelt to Sunspots," American Demographics, Nov. 1994. Longino explains that the failure of retirement communities (such as Lake Havasu City) to attract new retirees is causing a disruption in the traditional migration of older Americans.

The major employers in the Laughlin area are the casinos and hotel/casinos, now totalling ten, with more than 14,000 employees, and the Southern California Edison Co. generating plant.¹³ The number of casino employees will continue to grow, as there are plans for the construction of a number of additional casinos, according to the Laughlin Building Department. Among the planned new casinos are four to be built on the Fort Mohave Indian Tribe Reservation, anchoring a planned community along the Colorado River. That development alone will accommodate 40,000 residents, mostly non-Indian. Laughlin is well prepared for the anticipated growth, as demonstrated by the recent construction of the new airport and of the bridge connecting Laughlin to Bullhead.

Revenues from gaming in Laughlin exceeded \$500 million in 1992 and are expected to reach \$600 million in 1996. Over 5 million tourists visit Laughlin each year.¹⁴ Even during a period in which casinos in Las Vegas were experiencing a decrease in revenue, in 1988, Laughlin casinos were thriving and growing.¹⁵

In contrast to the \$600 million in casino and related revenue that is expected in Laughlin, Lake Havasu City's tourism business brings in approximately \$75 million to Lake Havasu City. In addition to tourism, Lake Havasu City's founding company, McCulloch Corporation, employs approximately 900 workers in the manufacture of chain saws, string trimmers and related products. Sterilite Corporation employs

¹³ History of Laughlin at 11. The generating plant is a 1.580 million-watt plant which provides electricity to 1.5 million customers in Nevada, Arizona, and California.

¹⁴ History of Laughlin at 8-9.

¹⁵ Source: Laughlin Chamber of Commerce.

another 100 people in its manufacture of plastic houseware products. Finally, there are a cluster of boat manufacturers, a manufacturer of engines for model boats and airplanes, a manufacturer of metal mirrors for laser applications, and a number of other small manufacturers.¹⁶

Meridian respectfully submits that the proposed change, by providing Laughlin with its own broadcast station, would serve the Commission's allotment priorities better than the existing allotment because Laughlin is and will in the future be far more capable of supporting a local television station than Lake Havasu City will be. In addition, the proposed Laughlin facilities will serve more than twice the population that would be reached by the Lake Havasu City station, and provide substantially more "second service." Cf. Farmington and Gallup, New Mexico, 11 FCC Rcd. 2357 (1996) (reallotting Channel 3 from Gallup to Farmington and modifying construction permit for unbuilt station, despite loss in potential first service, because it would provide "substantial" new first service and permit operator to locate in community better able to support station).

¹⁶ Arizona Department of Commerce, "Community Profile, Lake Havasu City."

Accordingly, Meridian respectfully requests that Section 73.606(b) of the Commission's Rules be amended in the following manner:

<u>Community</u>	<u>Existing</u>	<u>Proposed</u>
Lake Havasu City, AZ	Channel 34	---
Laughlin, NV	---	Channel 34

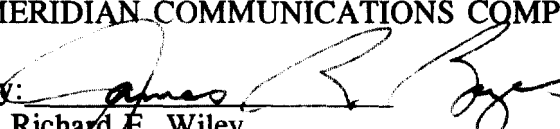
In addition, should the Commission determine that a replacement channel is appropriate, Channel 40 (or any of the eleven other channels identified in the Engineering Statement) can be allotted to Lake Havasu City.

Finally, Meridian requests that the Commission modify its existing authorization for Channel 34 to specify Laughlin, Nevada as the station's community of license. Upon receipt of the appropriate Commission authorization, Meridian will promptly undertake to build the specified facilities and commence operation of the new station.

Respectfully submitted,

MERIDIAN COMMUNICATIONS COMPANY

By:


Richard E. Wiley

James R. Bayes

of

Wiley, Rein & Fielding

1776 K Street, N W.

Washington, D.C. 20006

(202) 429-7000

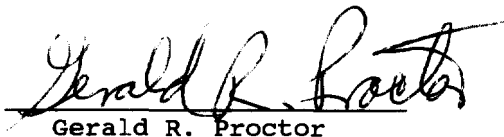
Its Attorneys

July 9, 1996

DECLARATION

I, Gerald R. Proctor, do hereby make the following declaration under penalties of perjury under the law of the State of Texas this 3rd day of July, 1996.

1. In August, 1994, I was a stockholder and director of Meridian Communications Company (Meridian). Since that time, I have resigned as a director and sold my stock in the company back to the company. However, in 1994, it was decided that the company would file an application for a new television station on Channel 34 in Lake Havasu City, Arizona. I agreed to make arrangements to acquire the required tower site and assist with the preparation of the equipment list necessary to build the station.
2. Arrangements were made with William Harakidas at Fisher Communications to locate Meridian's transmitter at the Crossman Communications Site, approximately 13.8 km east-northeast of Lake Havasu City. There is no commercial electric power to the site. Electricity is generated on-site by Fisher Communications. Available excess power is only sufficient to power a 10 kilowatt television transmitter and, accordingly, this is what was specified in the Meridian Lake Havasu City application.
3. The optimum site for maximum coverage of the portion of Arizona, California and Nevada near Lake Havasu City is a Bureau of Land Management site at Oatman, Arizona. Designated as the Goldroad Crest Communication Site ("GCCS") by the Bureau, this site is currently under final review prior to adoption of a comprehensive plan of development. Unfortunately, I do not believe a city grade signal can be placed over all of Lake Havasu City from GCCS.
4. I have been unable to identify any other developed sites which will allow for increased coverage of the area mentioned above. For this reason, a change in city of license from Lake City Havasu City, Arizona, to Laughlin, Nevada, is being requested by the petition being presented herewith and of which this declaration is a part.


Gerald R. Proctor

**DECLARATION OF PERRY C. ROGERS ON
BEHALF OF MERIDIAN COMMUNICATION'S COMPANY**

On behalf of Meridian Communication's Company
("Meridian"), I, Perry C. Rogers, its Secretary/Treasurer,
hereby make the following declaration, under penalty of
perjury under the laws of the State of Nevada:

1. I am a resident of the State of Nevada, residing in the City of Las Vegas. I am Secretary/Treasurer, a 50 percent shareholder, and a Director of Meridian, a Nevada corporation.
2. Meridian is the holder of the construction permit for television Channel 34, Lake Havasu City, Arizona (File No. BPCT-941031KN), granted May 1, 1996, following the Commission's approval of the Settlement Agreement to resolve the conflict between the competing applications filed by Meridian and Venture Technologies Group, Inc., dba World Television, Inc.
3. I have read the Petition for Rulemaking being submitted concurrently herewith by Meridian, requesting a change in community of license for Channel 34 from Lake Havasu City, Arizona to Laughlin, Nevada. The factual information in the Petition, including the information set forth therein concerning the communities of Lake Havasu City and Laughlin, was assembled by Meridian in connection with its application and in anticipation of the submission of the Petition, based on U.S. Census, Chamber of Commerce, and other local sources, and is true and correct to the best of my knowledge and belief.



Perry C. Rogers

Date: July 8, 1996



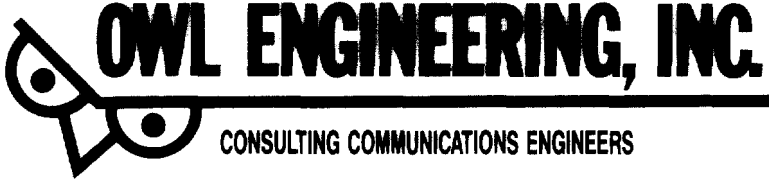
Exhibit A

1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502
1-800-797-1338

**ENGINEERING STATEMENT ON BEHALF OF
MERIDIAN COMMUNICATIONS COMPANY
IN SUPPORT OF A PETITION TO AMEND
THE TV TABLE OF ALLOTMENTS
LAUGHLIN, NEVADA**

July 5, 1996

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THE TV TABLE OF ALLOTMENTS
LAUGHLIN, NEVADA**

Owl Engineering, Inc. has been retained by Meridian Communications Company (hereafter Meridian) to prepare this engineering statement in support of a Petition to Amend the TV Table of allotments, FCC Rule Section 73.606(b) as follows:

<u>Location</u>	<u>Present</u>	<u>Proposed</u>
Laughlin, NV		34+
Lake Havasu City, AZ	34+	40*

*Note: Channel 40 is one of multiple channels available for use at Lake Havasu City.

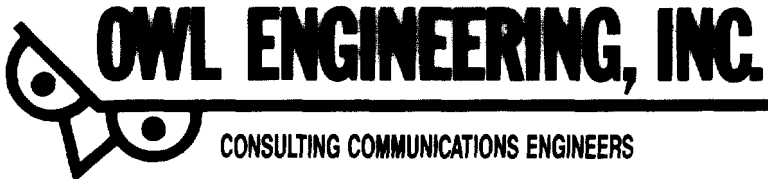
The reference coordinates for Laughlin, NV used in this study are:

35° 01' 57" North Latitude
114° 21' 56" West Longitude

The reference coordinates for Lake Havasu City, AZ used in this study are:

34° 29' 02" North Latitude
114° 19' 18" West Longitude

The reference coordinates listed above for Laughlin, NV represent a developed communications site located on Oatman Mountain. The reference coordinates for Lake Havasu City, AZ are based on the reference coordinates of the city.



CONSULTING COMMUNICATIONS ENGINEERS

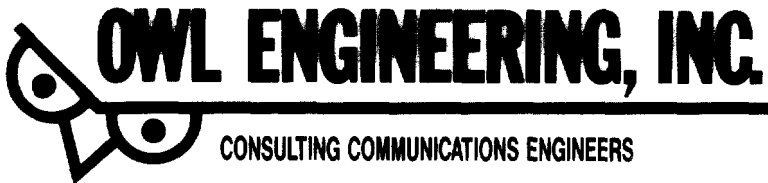
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**ENGINEERING STATEMENT ON BEHALF OF
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THE TV TABLE OF ALLOTMENTS
LAUGHLIN, NEVADA**

Included as Engineering Exhibit E-1 is a channel allocation study for Laughlin based on the reference coordinates listed above. As can be seen from this exhibit, Meridian's proposal is in complete conformance with the mileage spacing requirements FCC Rule Section 73.610 and Table II of 73.698. The only station limiting transmitter site selection is KFBT, Las Vegas, NV. The available land area with the restriction imposed by KFBT is depicted in Engineering Exhibit E-2.

Meridian's proposal was examined to determine if a television facility located at the reference coordinates listed above would comply with FCC Rule Section 73.685 regarding minimum signal coverage requirements to the city of Laughlin. The reference coordinate for Laughlin were selected due to the favorable characteristics of the site. The Oatman Mountain site is considered an Antenna Farm capable of supporting high power television transmitters. Due to this fact, the predicted contours for Laughlin, NV are based on an Effective Radiated Power (ERP) of 5,000 Kilowatts. The antenna height was assumed to be 585 meters Height Above Average Terrain, identical to KMOHTV which operates from the reference coordinates.

The radial drawn through Laughlin is depicted on the profile plot included as Engineering Exhibit E-3. This permitted a determination to be made that there are no major obstructions in the intervening path from the transmitter site to the principal community. The City Grade (80 dBu) contour is depicted in Engineering Exhibit E-4. As can be seen from Engineering Exhibit E-4, the community of Laughlin is completely served by a signal of 80 dBu or greater.



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THE TV TABLE OF ALLOTMENTS
LAUGHLIN, NEVADA**

An engineering study was performed to determine the number of persons to be served by the proposed Grade B (64 dBu) contour at Laughlin. The 64 dBu contour was calculated along the standard 45 degree spaced radials in conjunction with the FCC's F(50,50) metric curves. The proposed facilities would serve a population of 106,572 persons encompassed in an area of 33,979 km².

A comparison of the proposed operation at Laughlin was made with the proposed facilities located at Lake Havasu City, AZ. Based on the engineering data supplied in the application for construction permit, the proposed facilities at Lake Havasu City, AZ will provide a 64 dBu signal to 51,274 persons encompassed in an area of 10,193 km². The reference facility at Laughlin will increase the population served by 107.8% and the area served by 233.4%.

An engineering study was performed to determine the impact on underserved population areas by the reference facility for Laughlin and Lake Havasu City. Included as Engineering Exhibit E-5 is a map depicting all Grade B television signals in the Laughlin and Lake Havasu City area. As can be seen from this exhibit, neither facility will provide a first visual service.

The reference facility at Laughlin will provide second visual service to 62,088 persons in an area of 21,182 km². The proposed facility at Lake Havasu City will provide second visual service to 49,273 persons in an area of 9,572 km². Based on this information, the reference facility at Laughlin, NV will provide second visual service to 12,815 more persons and an additional 11,610 km².



OWL ENGINEERING, INC.

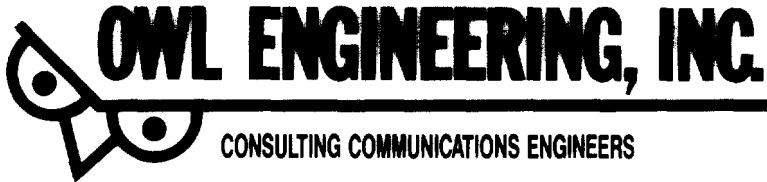
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THE TV TABLE OF ALLOTMENTS
LAUGHLIN, NEVADA**

Included as Engineering Exhibit E-6 is a channel allocation study for Lake Havasu City based on the reference coordinates listed above. As can be seen from this exhibit, channel 40 at Lake Havasu City is in complete conformance with FCC Rule Section 73.610 and Table II of 73.698.

In addition to channel 40 being available for use at Lake Havasu City, the channels listed below are also available for allocation at Lake Havasu City with little or no site restriction: 23,25,43,46,47,52,53,55,56,57,58.



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THE TV TABLE OF ALLOTMENTS
LAUGHLIN, NEVADA**

AFFIDAVIT

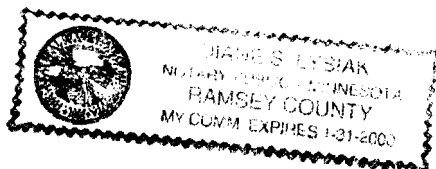
RAMSEY COUNTY)
)
STATE OF MINNESOTA) **ss:**

Michael W. Radovich, being first duly sworn, says that he is an employee of Owl Engineering, Inc., consulting communications engineers with offices in Arden Hills, Minnesota: that his qualifications as an expert in communications engineering are a matter of record with the Federal Communications Commission: that the foregoing exhibit was prepared by him and under his direction; and that the statements contained therein are true of his own personal knowledge except those stated to information and belief and, as to those statements, verily believes them to be true and correct.



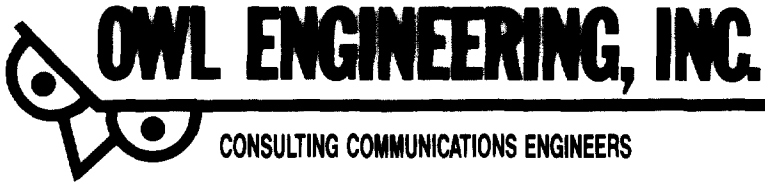
Michael W. Radovich
Michael W. Radovich, P.E.

Subscribed and sworn to before me this date July 5, 1996



Diane S. Lysiak
Diane S. Lysiak
Notary Public

My commission expires January 31, 2000



CONSULTING COMMUNICATIONS ENGINEERS

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ENGINEERING EXHIBIT E-1

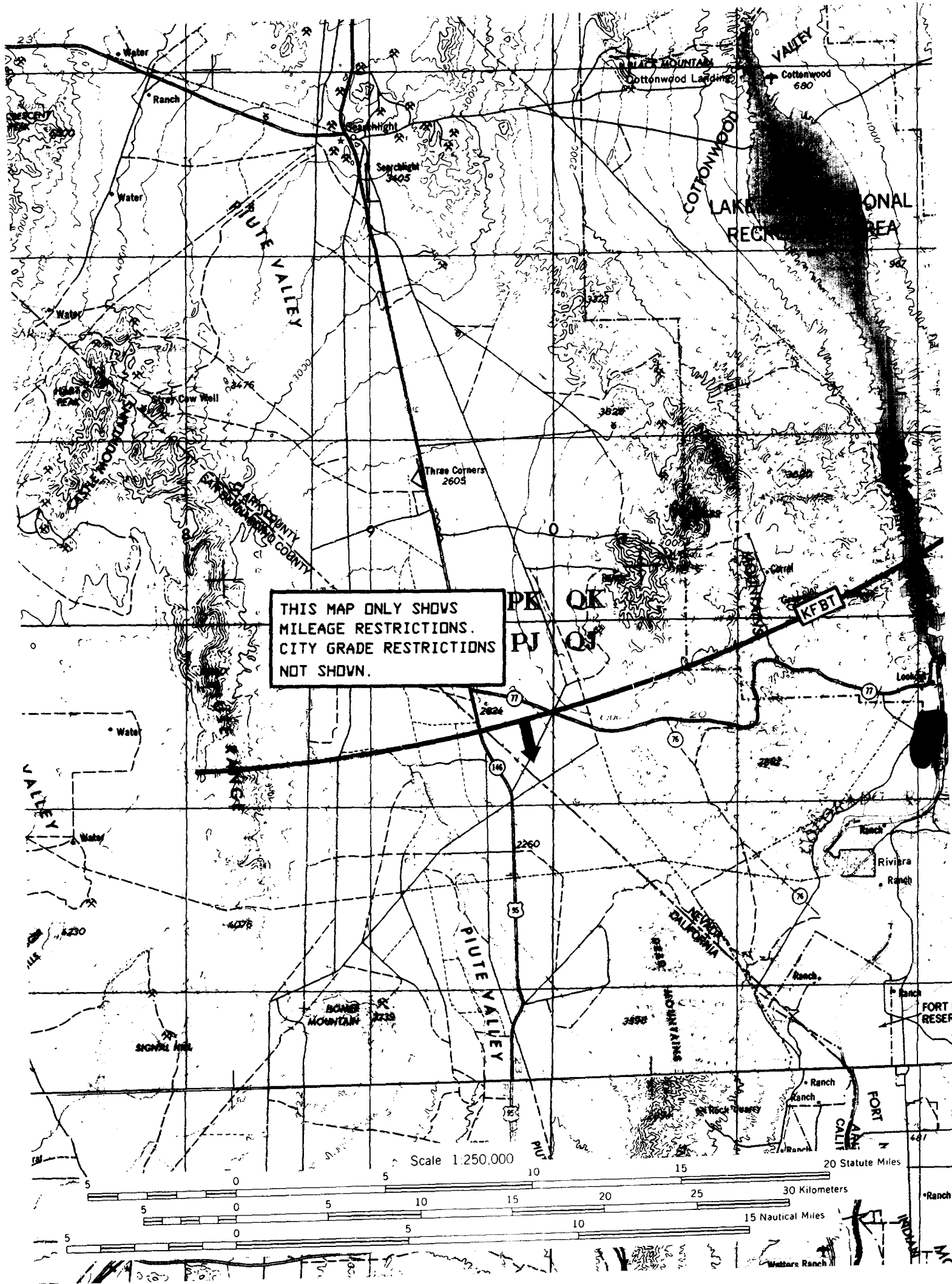
CHANNEL ALLOCATION STUDY

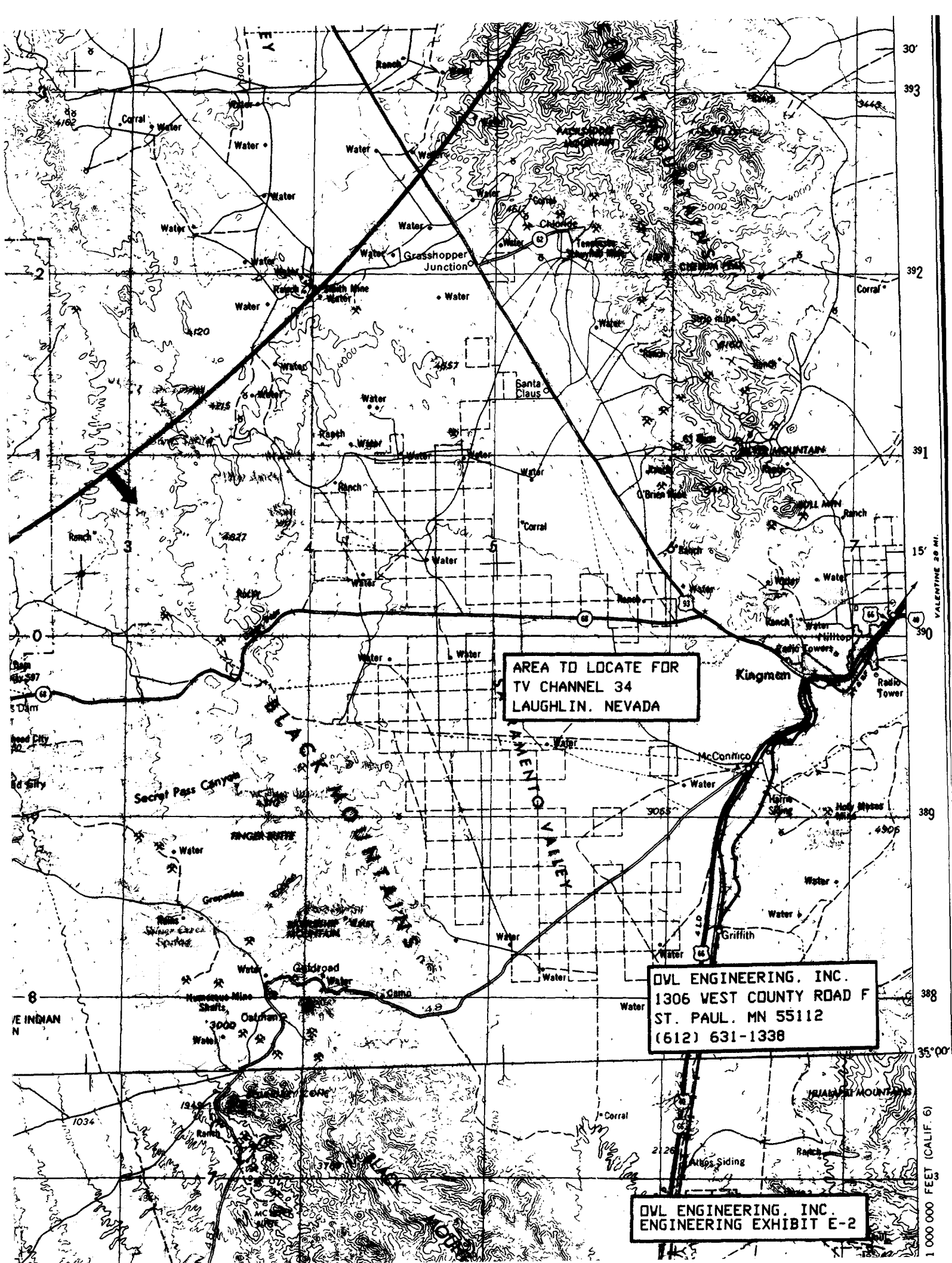
Job Title: Laughlin, NV
TV Channel 34

LATITUDE: 35 1' 57" LONGITUDE: 114 21' 56"

CHNL Call Zone Status	Owner	City	Class	Calculated Km.	Required Km.	Delta km.	Bearing degrees
34+	TAAZ	LAKE HAVASU CITY		60.992	280.8	-219.81	176.23*
2			34 29' 2	114 19' 18		^^^^^^	
	ERP = 0.000KW	HAMSL = 0.0m	HAAT = 0.0m				
34Z	KMEXTV	TVCA LOS ANGELES		350.876	280.8	70.08	256.23
2	LIC	SPANISH INTERNATIONAL	34 13' 35	118 3' 56			
	ERP = 1950KW	HAMSL = 1791.0m	HAAT = 896.0m				
	DA ANDODDKMEXTV-CP	Rotation: 0					
35	NO CONFLICT						
33+	KFBT	TVNV LAS VEGAS		118.444	87.7	30.74	329.10
2	LIC	CHANNEL 33, INC.	35 56' 44	115 2' 31			
	ERP = 1350KW	HAMSL = 1370.0m	HAAT = 581.0m				
	DA SWRODD890810KE	Rotation: 0					
42	NO CONFLICT						
26	NO CONFLICT						
41	NO CONFLICT						
27	NO CONFLICT						
48	NO CONFLICT						
20	NO CONFLICT						
49	NO CONFLICT						
19	NO CONFLICT						
36	NO CONFLICT						
32	NO CONFLICT						
37	NO CONFLICT						
31	NO CONFLICT						
38	NO CONFLICT						
30	NO CONFLICT						
39	NO CONFLICT						
29	NO CONFLICT						

*Proposed substitution at Laughlin, NV.



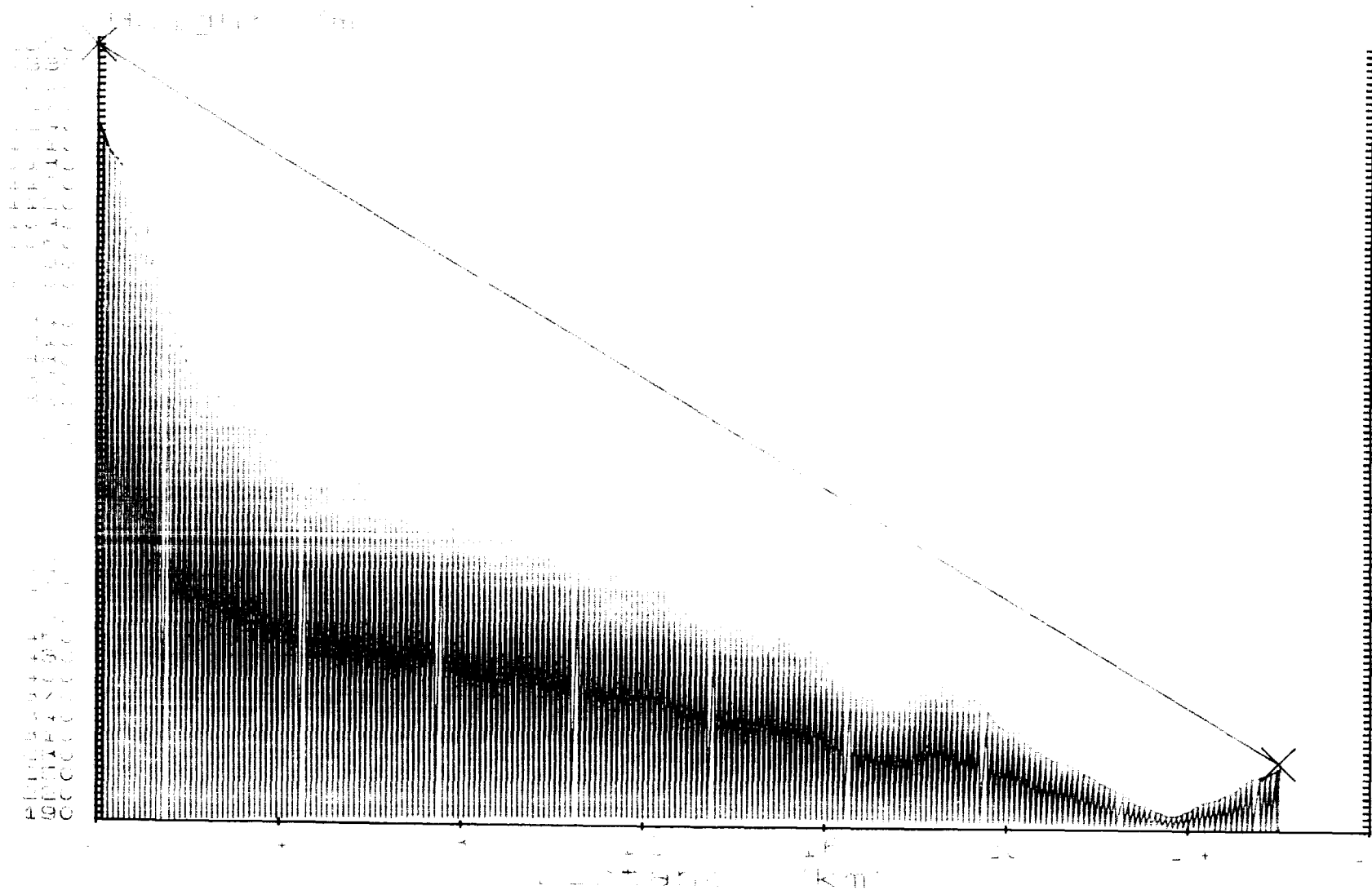


AREA TO LOCATE FOR
TV CHANNEL 34
LAUGHLIN, NEVADA

OVL ENGINEERING, INC.
1306 WEST COUNTY ROAD F
ST. PAUL, MN 55112
(612) 631-1338

OVL ENGINEERING, INC.
ENGINEERING EXHIBIT E-2

1,000,000 FEET (CALIF. 6)

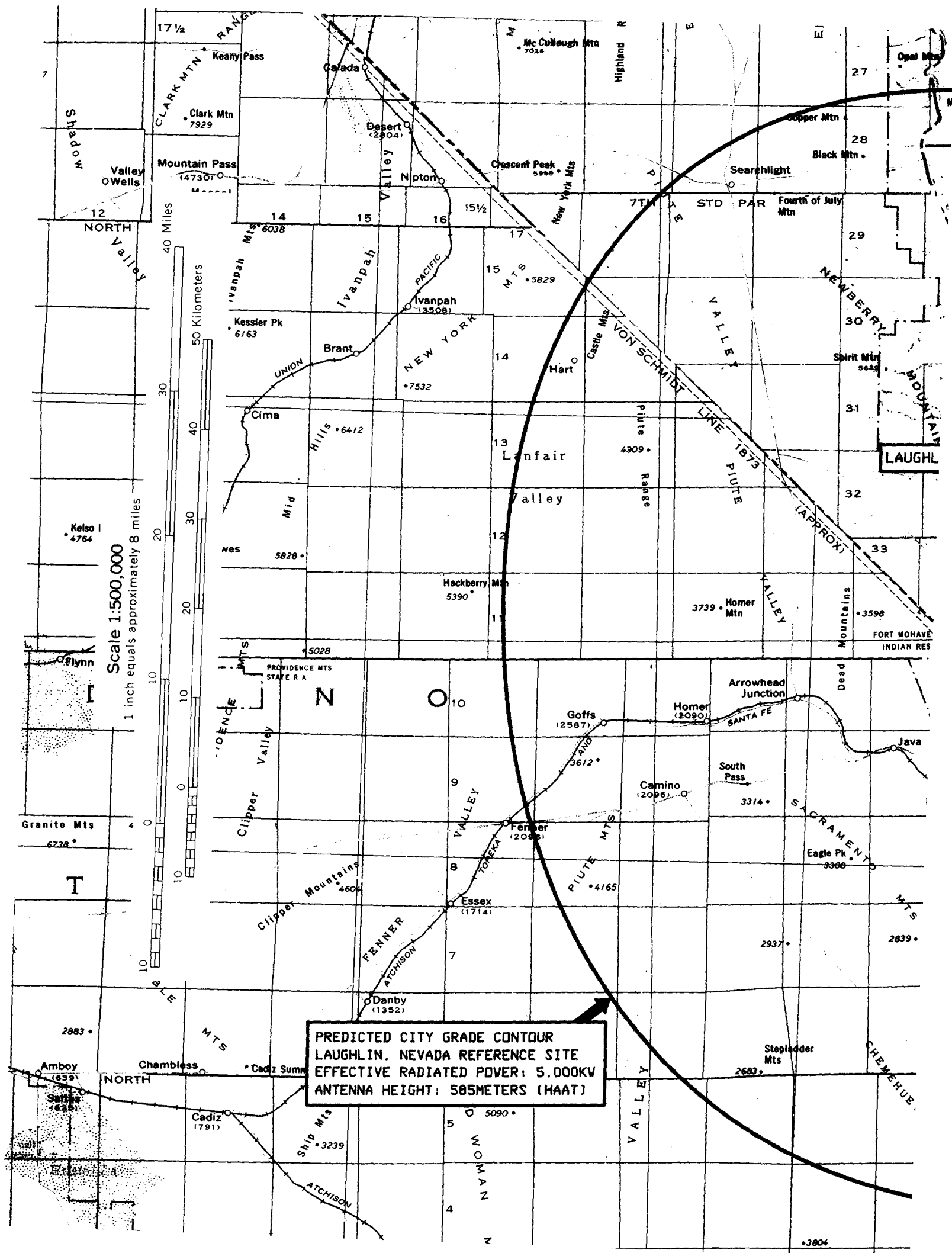


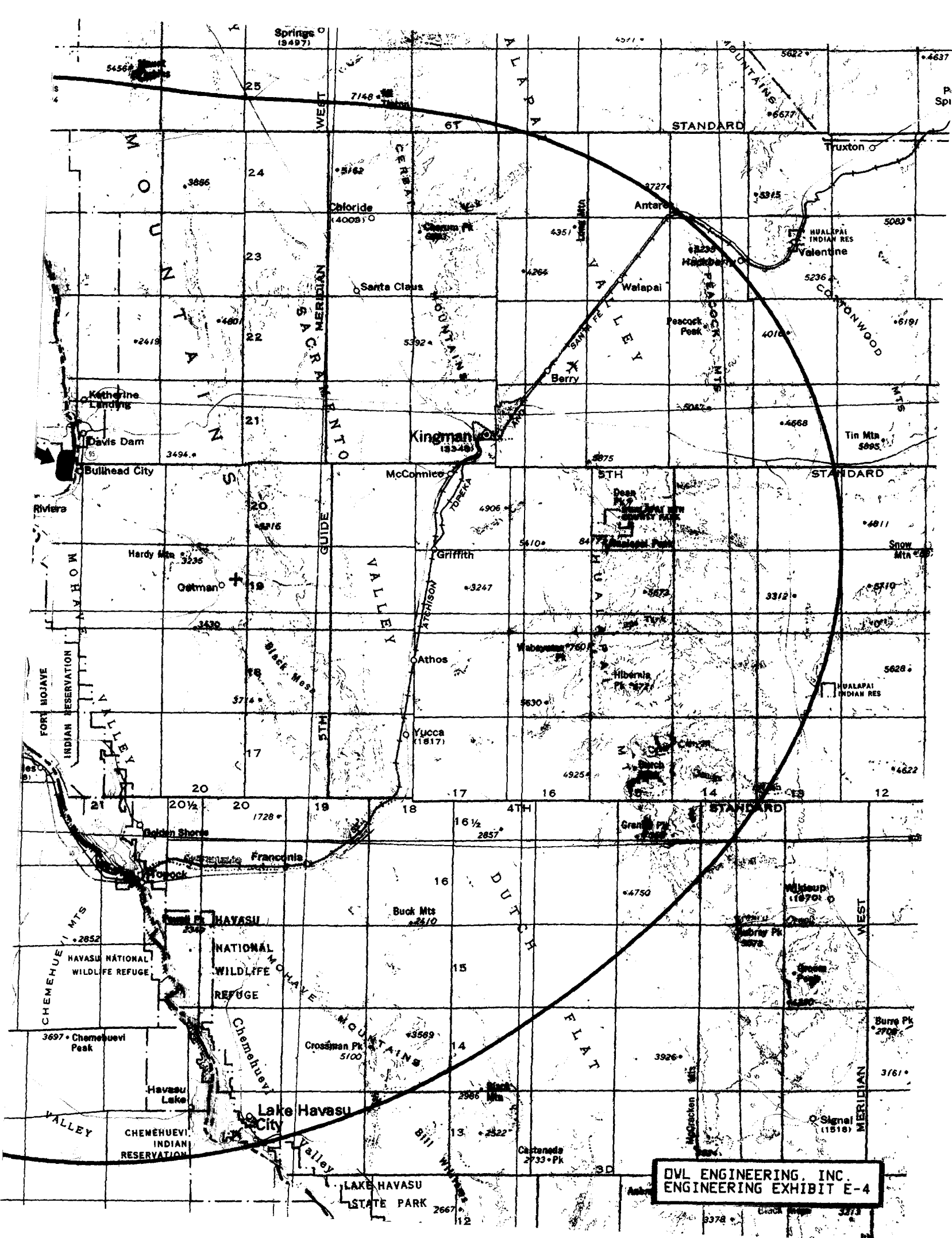
Profile Study for Laughlin, NV

Owl Engineering, Inc.
1306 W. County Rd. F

Saint Paul, Minnesota
(612) 631-1338

Engineering Exhibit E-3





Winchester
Spring Valley
Paradise
Enterprise
Henderson
Boulder

0 0 20 40 60
KILOMETERS

KLAS/KTNV

LAKE HAVASU.

64.0 dBu

47.0 dBu

64.

Twentynine Palms Base

Twentynine Palms

Joshua Tree
Yucca Valley

Morongo Valley

Desert Hot Springs

Cathedral City
Thousand Palms